

REMARKS

Applicants appreciate the Examiner's thorough review of the present application, and respectfully request reconsideration in light of the preceding amendments and the following remarks.

Claims 1, 3-5, 7-14 and 16-22 are pending in the application. Several claims have been amended to improve claim language and/or better define the claimed invention. New claim 23 has been added to provide Applicants with the scope of protection to which they are believed entitled. The amended/added claims find solid support in the original application, especially the drawings. No new matter has been introduced through the foregoing amendments.

The new 35 U.S.C. 102(b) rejections of all claims are respectfully traversed for the reasons set forth below.

1. As to *Peterson*, the Examiner alleges that the reference discloses a common mode choke at 20, a neutral point at 312, and a connecting element including resistor 50c and capacitor 30f. Applicants respectfully disagree with the Examiner's interpretation of the reference.

Specifically, element 20 of *Peterson* is not a common mode choke. More particularly, since the capacitors are arranged for each phase of polyphase AC to AC inverter 300, inductors 20 cannot be considered as a common mode choke; it is at best, and if at all, a normal mode choke of an LC filter. Thus, *Peterson* does not teach or disclose the claimed common mode choke recited in all independent claims.

Further, the Examiner's interpretation of point 312 as the claimed neutral point, and the series of resistor 50c and capacitor 30f as the claimed connecting element is improper, because resistor 50c is part of the AC circuit 50, rather than part of a connecting element and because point 312 is clearly on the power system side and is not a neutral point of the AC circuit 50.

Perhaps, the Examiner's improper claim interpretation results from a misunderstanding of the claimed AC circuit as a *source*, instead of a *load*. Therefore, even though no amendments are required in view of the irrelevancy of the applied art, Applicants have amended the independent claims, solely for the purpose of expediting prosecution, to clarify the AC circuit as an AC load. The *Peterson* reference should now be interpreted to include a neutral point of the AC load, i.e., 50, at 32 rather than at 312 which can be considered, at best, and if at all, as a reference potential point. A connecting element between 32 and 312 then includes only coil 60, failing to teach or disclose a capacitor and a resistor connected in series between the neutral point and the reference potential point, contrary to independent claims 1, 5 and 14.

Accordingly, Applicants respectfully submit that all independent claims are not anticipated by *Peterson*.

2. As to *Julian*, the Examiner alleges that the reference discloses a common mode choke at 74-77, a neutral point between capacitors 42-44, and a connecting element including resistor 26 and capacitor 38. Applicants respectfully disagree with the Examiner's interpretation of the reference.

Specifically, elements 74-77 of *Julian* do not define a common mode choke. More particularly, since the capacitors are arranged for each phase of LC filter 72, inductors 74-77 cannot be considered as a common mode choke; they define at best, and if at all, inductors of a normal mode choke of an LC filter. Thus, *Julian* does not teach or disclose the claimed common mode choke recited in all independent claims.

Further, the Examiner's interpretation of *Julian* improperly places the neutral point (between capacitors 42-44) on the *source* side, rather than on the *load* side. Solely for the purpose of expediting prosecution, Applicants have amended the independent claims to define that the neutral point is on the load side. In view of the amendments, the *Julian* reference should now be

interpreted to include a neutral point (of the AC load 22) between elements 38 and 26 and, at best and if at all, a reference potential point between capacitors 42, 44. A connecting element (along which I_{ground} flows) then includes only capacitor 38, failing to teach or disclose a capacitor and a resistor connected in series between the neutral point and the reference potential point, contrary to independent claims 1, 5 and 14.

Accordingly, Applicants respectfully submit that all independent claims are not anticipated by *Julian*.

3. As to *Enjeti*, the Examiner alleges that the reference discloses a common mode choke at 42, a neutral point at 35, and a connecting element including resistor 44 and capacitor 46. Applicants respectfully disagree with the Examiner's interpretation of the reference.

Specifically, element 42 of *Enjeti* is not a common mode choke. More particularly, since the capacitors 46a-c are arranged for each phase of converter output filter 40, inductors 42a-c cannot be considered as a common mode choke; they define at best, and if at all, inductors of a normal mode choke of an LC filter. Thus, *Enjeti* does not teach or disclose the claimed common mode choke recited in all independent claims.

Further, the Examiner's interpretation of *Enjeti* improperly places the neutral point 35, again, on the *source* side, rather than on the *load* side. Solely for the purpose of expediting prosecution, Applicants have amended the independent claims to define that the neutral point is on the load side. In view of the amendments, the *Enjeti* reference should now be interpreted to include an AC load at 18 and, at best and if at all, a reference potential point at 35. There is no connecting element that connects a neutral point of load 18 with point 35. The branching points between 42a and 44a, 42b and 44b, and 42c and 44c are clearly not a neutral point of load 18. The reference fails to teach or suggest the claimed connecting elements recited in all independent claims.

Accordingly, Applicants respectfully submit that all independent claims are not anticipated by *Enjeti*.

The dependent claims, including any new claim(s), are considered patentable at least for the reason(s) advanced with respect to the respective independent claim(s).


Each of the Examiner's rejections has been traversed/overcome. Accordingly, Applicants respectfully submit that all claims are now in condition for allowance. Early and favorable indication of allowance is courteously solicited.

The Examiner is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

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